

P. Warren Hunt (P69713) (Admitted Pro Hac Vice)

Kerr, Russell and Weber, PLC

500 Woodward Avenue, Suite 2500

Detroit, MI 48226

(313) 961-0200

pwh@krwlaw.com

Counsel for Creditors: AVL Michigan Holding Corporation, Windsor Mold Inc., AVL Instrumentation & Test Systems, Inc., Fleet-Car Lease, Inc., RMT Acquisition Company, LLC, d/b/a RMT Woodworth, The Narmco Group, Mold Masters Co., Delta Tooling Co., AVL Americas, Inc., AVL Powertrain Engineering, Inc., Ferndale Electric Co., Inc., and C.B.S. Boring and Machine Company, Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	CHAPTER 11
)	
MOTORS LIQUIDATION COMPANY,)	Case No: 09-50026
)	(Jointly Administered)
Debtors.)	
)	Honorable Robert E. Gerber

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR CREDITORS
AVL MICHIGAN HOLDING CORPORATION, WINDSOR MOLD INC., AVL
INSTRUMENTATION & TEST SYSTEMS, INC., FLEET-CAR LEASE, INC.,
RMT ACQUISITION COMPANY, LLC, D/B/A RMT WOODWORTH, THE
NARMCO GROUP, MOLD MASTERS CO., DELTA TOOLING CO., AVL
AMERICAS, INC., AVL POWERTRAIN ENGINEERING, INC., FERNDALE
ELECTRIC CO., INC., AND C.B.S. BORING AND MACHINE COMPANY, INC.**

P. Warren Hunt of Kerr, Russell and Weber, PLC, former counsel of record for creditors AVL Michigan Holding Corporation, Windsor Mold Inc., AVL Instrumentation & Test Systems, Inc., Fleet-Car Lease, Inc., RMT Acquisition Company, LLC, d/b/a RMT Woodworth, The Narmco Group, Mold Masters Co., Delta Tooling Co., AVL Americas, Inc., AVL Powertrain Engineering, Inc., Ferndale Electric Co., Inc., and C.B.S. Boring and Machine Company, Inc. (collectively the "Creditors") for his Motion to Withdraw as counsel, states:

1. P. Warren Hunt filed Notice of Appearance and Request for Electronic Notice as counsel for the Creditors as follows:

CREDITOR	DATE FILED	DOCKET NO.
AVL Michigan Holding Corporation	6/12/2009	802

CREDITOR	DATE FILED	DOCKET NO.
Windsor Mold Inc.	6/12/2009	823
AVL Instrumentation & Test Systems, Inc.	6/12/2009	847
Fleet-Car Lease, Inc.	6/12/2009	885
RMT Acquisition Company, LLC, d/b/a RMT Woodworth	6/15/2009	1288
National Auto Radiator Manufacturing Company Limited, Central Stampings Limited, Prince Metal Products Limited, Nartech Metal Products Limited and Prince Metal Stampings USA Limited (collectively "The Narmco Group")	6/15/2009	1352
Mold Masters Co.	6/16/2009	1630
Delta Tooling Co.	6/16/2009	1631
AVL Americas, Inc.	6/17/2009	1703
AVL Powertrain Engineering, Inc.	6/17/2009	1706
Ferndale Electric Co., Inc.	6/18/2009	1831
C.B.S. Boring and Machine Company, Inc.	7/8/2009	3049

2. P. Warren Hunt of Kerr, Russell and Weber, PLC no longer represents Creditors in this case.
3. Creditors will not be prejudiced by the withdrawal of P. Warren Hunt.
4. The parties to this action will not be prejudiced by the withdrawal of P. Warren Hunt.
5. A proposed order granting withdrawal is attached as Exhibit A.

WHEREFORE, P. Warren Hunt requests that this Court (1) enter an Order Approving P. Warren Hunt's Motion to Withdraw as Counsel of Record for Creditors without requiring a hearing; and (2) remove P. Warren Hunt, whose email address is: pwh@krwlaw.com, from the mailing matrix and from receiving electronic filings in this case.

Dated: November 22, 2013

By: /s/P. Warren Hunt
P. Warren Hunt (P69713)
Kerr, Russell and Weber, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
Telephone: 313-961-0200
Fax: 313-961-0388
pwh@krwlaw.com

EXHIBIT A

P. Warren Hunt (P69713) (Admitted Pro Hac Vice)
Kerr, Russell and Weber, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
(313) 961-0200
pwh@krwlaw.com

Counsel for Creditors: AVL Michigan Holding Corporation, Windsor Mold Inc., AVL Instrumentation & Test Systems, Inc., Fleet-Car Lease, Inc., RMT Acquisition Company, LLC, d/b/a RMT Woodworth, The Narmco Group, Mold Masters Co., Delta Tooling Co., AVL Americas, Inc., AVL Powertrain Engineering, Inc., Ferndale Electric Co., Inc., and C.B.S. Boring and Machine Company, Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	CHAPTER 11
)	
MOTORS LIQUIDATION COMPANY,)	Case No: 09-50026
)	(Jointly Administered)
Debtors.)	
)	Honorable Robert E. Gerber

ORDER APPROVING WITHDRAWAL AS COUNSEL FOR CREDITORS AVL MICHIGAN HOLDING CORPORATION, WINDSOR MOLD INC., AVL INSTRUMENTATION & TEST SYSTEMS, INC., FLEET-CAR LEASE, INC., RMT ACQUISITION COMPANY, LLC, D/B/A RMT WOODWORTH, THE NARMCO GROUP, MOLD MASTERS CO., DELTA TOOLING CO., AVL AMERICAS, INC., AVL POWERTRAIN ENGINEERING, INC., FERNDALE ELECTRIC CO., INC., AND C.B.S. BORING AND MACHINE COMPANY, INC.

This matter having come before the Court by the filing of P. Warren Hunt's Motion to Withdraw as Counsel of Record for Creditors AVL Michigan Holding Corporation, Windsor Mold Inc., AVL Instrumentation & Test Systems, Inc., Fleet-Car Lease, Inc., RMT Acquisition Company, LLC, d/b/a RMT Woodworth, The Narmco Group, Mold Masters Co., Delta Tooling Co., AVL Americas, Inc., AVL Powertrain Engineering, Inc., Ferndale Electric Co., Inc., and C.B.S. Boring and Machine Company, Inc. (collectively the "Creditors") and the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED THAT:

P. Warren Hunt of Kerr, Russell and Weber, PLC, is hereby withdrawn and discharged as counsel for the Creditors in this case.

IT IS FURTHER ORDERED THAT:

P. Warren Hunt, whose email address is: pwh@krwlaw.com, is removed from the mailing matrix and from receiving electronic filings in this case.

P. Warren Hunt (P69713) (Admitted Pro Hac Vice)
Kerr, Russell and Weber, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
(313) 961-0200
pwh@krwlaw.com

Counsel for Creditors: AVL Michigan Holding Corporation, Windsor Mold Inc., AVL Instrumentation & Test Systems, Inc., Fleet-Car Lease, Inc., RMT Acquisition Company, LLC, d/b/a RMT Woodworth, The Narmco Group, Mold Masters Co., Delta Tooling Co., AVL Americas, Inc., AVL Powertrain Engineering, Inc., Ferndale Electric Co., Inc., and C.B.S. Boring and Machine Company, Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	CHAPTER 11
)	
MOTORS LIQUIDATION COMPANY,)	Case No: 09-50026
)	(Jointly Administered)
Debtors.)	
)	Honorable Robert E. Gerber

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2013, I electronically filed the foregoing Motion to Withdraw as Counsel of Record with the Clerk of the Court using the ECF system which will send notification of such filing to all ECF Participants in connection with this matter.

Dated: November 22, 2013

By: /s/P. Warren Hunt
P. Warren Hunt (P69713)
Kerr, Russell and Weber, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
Telephone: 313-961-0200
Fax: 313-961-0388
pwh@krwlaw.com